

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff.

vs.

ASHLEY THOMPSON

Defendant.

Case No. 1:22-CR-1520-003-JB

UNOPPOSED MOTION TO CONTINUE SENTENCING

COMES NOW, Defendant, Ashley Thompson, by and through undersigned counsel,
respectfully requests this Honorable Court continue the sentencing in this matter currently set
for October 7, 2024 at 8:30 a.m., and in support thereof states the follows:

1. Defendant is currently at Darrin's Place, a rehabilitation facility in Espanola, NM. The program is initially a 90 day program with the option to extend to 180 days. Ms. Thompson began on April 12, 2024 and is expected to complete the 180 day program graduating on October 10, 2024. Ms. Thompson has already secured a bed at Oxford House in Las Cruces and been accepted to attend NMSU and would like the opportunity to continue to demonstrate her progress and sobriety prior to sentencing.
2. The parties in this case respectfully request a ninety-day continuance date from the October 7, 2024 setting.
3. The Defendant is not in custody.

4. The instant motion comprises Ms. Thompson's second request to continue the sentencing.
5. This request for a continuance is not based on general congestion of the Court's calendar, or lack of diligent preparation on the part of the attorney for the defendant. As a result, the ends of justice served by continuing the sentencing in this matter outweigh the best interest of the public and the parties.
6. Assistant United States Attorney, Timothy Trembley was contacted in regard to this request and does not oppose the relief requested.

WHEREFORE, Defendant, Ashley Thompson, respectfully requests that the Court enter an order continuing the sentencing herein set for October 7, 2024, find that the ends of justice are served by the granting of the continuance and outweigh the best interest of the public and the parties, and reset the sentencing in approximately 90 days from October 7, 2024.

Respectfully submitted,
JEDIDIAH J. GLAZENER, ESQ

By: /s/ Jedidiah J. Glazener
Jedidiah J. Glazener, Esq.
Attorney for Defendant
100 Gold Ave. SW, Ste. 206
Albuquerque, NM 87102
Tel: (505) 688-8144
Fax: (505) 212-1337

I hereby certify that a true and correct copy of the foregoing pleading sent, via the Court's CM/ECF notification system, to Assistant United States Attorney Timothy Trembley.

/s/ Jedidiah J. Glazener
Jedidiah J. Glazener, Esq.
Attorney for Defendant